

EXHIBIT J

In the Matter Of:

Henry vs

Brown University

ELAINE VARAS

August 02, 2023



1 IN THE UNITED STATES DISTRICT COURT

2 NORTHERN DISTRICT OF ILLINOIS

3 EASTERN DIVISION

4 - - -

5	HENRY, et al,	:	
		:	
6	Plaintiffs,	:	CASE NO.
		:	1:22-CV-00125
7	v.	:	
		:	
8	BROWN UNIVERSITY, et	:	
	al,	:	
9		:	
	Defendants.	:	

10 - CONFIDENTIAL -
11 ATTORNEYS' EYES ONLY

12 - - -

13 August 2, 2023

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16 Videotaped deposition of
17 ELAINE P. VARAS, taken pursuant to
18 notice, was held at University of
19 Pennsylvania, 2929 Walnut Street,
20 Philadelphia, Pennsylvania, beginning at
21 9:46 a.m., on the above date, before
Michelle L. Gray, a Registered
Professional Reporter, Certified Court
Reporter, Certified Realtime Reporter,
and Notary Public.

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23 Final transcript without Confidentiality Designations

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22 Pennsylvania
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290

1 A. That doesn't mean that they
2 are getting into Penn.

3 Q. Okay. How much does a donor
4 have to contribute to get their kid into
5 Penn?

6 A. There is no such concept.
7 Donor does -- it doesn't matter what a
8 donor is giving. That is not considered
9 in reviewing of an acceptance to Penn.

10 MR. GRINGER: Thank you.
11 Nothing further.

12 MR. RAYMAR: Nothing
13 further.

14 THE VIDEOGRAPHER: The time
15 is now 6:07 p.m. And this -- I'm
16 sorry.

17 MR. GRINGER: We have to ask
18 if people on the Zoom have
19 questions.

20 THE VIDEOGRAPHER: Does
21 anybody have any questions on
22 Zoom?

23 MR. MEDICI: This is Dan
24 Medici from the law firm of White